

PROPOSED GREAT NORTH ROAD SOLAR AND BIODIVERSITY PARK DEVELOPMENT CONSENT ORDER (REF: EN020262)

EXAMINING AUTHORITY'S SECOND WRITTEN QUESTIONS (ExQ2)

RESPONSES OF NATIONAL GAS TRANSMISSION PLC

In ExQ2 the Examining Authority addressed certain questions to National Gas Limited. To note, the correct entity name is National Gas Transmission plc ("NGT"). Addleshaw Goddard LLP acts for NGT.

ExQ Reference	Question to:	Question:	NGT Response
Q10.2.5	The applicant and National Gas Ltd	<p>National Gas Ltd (NGL)</p> <p>The applicant's Concept Design Parameters and Principles [REP3-068] in relation to works 6 and 7 says that '<i>The Undertaker will consult with National Gas Limited before any relevant application to discharge Requirement 6 of the DCO is submitted to the planning authority. The Undertaker will have appropriate regard to any feedback provided by National Gas Limited, with the aim to avoid any operational conflict with National Gas assets.</i>' However, on the utilities plan [REP3-099], NGL is not listed on the legend hence no NGL assets are apparent.</p> <p>a. Based on this information why is such a consultation necessary?</p> <p>b. If it is necessary would it be effective, if there was a conflict is it realistic to think that it could be rectified at the detailed design stage?</p> <p>c. If there is a potential interaction with NGL's assets would it not be preferable to rely upon suitable protective provisions, which according to the applicant have been agreed [REP3-099]?</p>	<p>The Concept Design Parameters and Principles [REP3-068] and Requirement 6 should be updated to refer to 'National Gas Transmission plc' rather than 'National Gas Limited'.</p> <p>NGT's apparatus is shown in the plan at Appendix 1 of this submission.</p> <p>a. NGT owns and operates a high-pressure pipeline (FM09 - Silk Willoughby to Staythorpe) located approximately 700 metres from the red-line boundary of the Order Limits as shown on the plan at Appendix 1. Although there is no direct physical interface between the Apparatus and the DCO Project's Works (there is no cable crossing over the apparatus), there is the potential for electromagnetic interference which NGT needs to be consulted on.</p> <p>Under the UKOPA Good Practice Guide UKOPA/GPG/027 Edition 1.1 - AC Corrosion Guidelines 2023, projects should assess for the potential impacts from electromagnetic interference on high-pressure pipelines up to 1km from the emitting project: ("<i>The a.c. interference risk on all existing pipelines should be assessed in accordance with the pipeline design code requirements. All overhead power lines or a.c. substations within 1000m of a pipeline system operating at</i></p>

d. Could the applicant and NGL provide a final definitive position, and this reflected in any changes to the dDCO and application documents?
e. Who is GTC with regard to gas assets as shown in the legend on the utility plan [REP3-099] does it have any potentially affected apparatus, is it a statutory undertaker, and does it require any PPs?

voltages of 66 kV or above should be considered.”, para 6.5) Within this range, there is the potential that in the event of an electrical fault, currents can flow into the ground through a grounding system, causing the surrounding ground to become electrically charged. This current flow causes the ground potential in the vicinity of the fault to rise significantly which can extend several meters away from the point of contact. The magnitude of ground potential rise depends on several factors but the risk increases significantly if pipelines are present due to the potential for the current to be conducted along its length. Pipelines with low resistance to electromagnetic interference are particularly susceptible such interference and there is a risk of electric shock to personnel and equipment working on or in proximity to any such pipeline when a fault occurs.

Although the Applicant has a duty to consider earthing design and electromagnetic interference in the design of its Project, there are a different set of standards for pipelines, as set out in UKOPA/GPG/050 Edition 1 - Electrical Interaction on Pipelines: Collaboration between Developers and Operators, which help ensure compliance to the Pipelines Safety Regulations 1996.

The assessment of these effects is a specialist area, requiring specialist competencies. NGT reserve the right to approval any assessments of such effects on its pipelines.

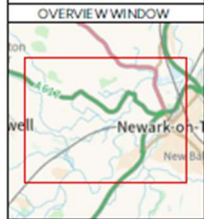
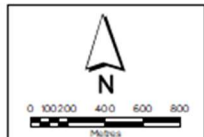
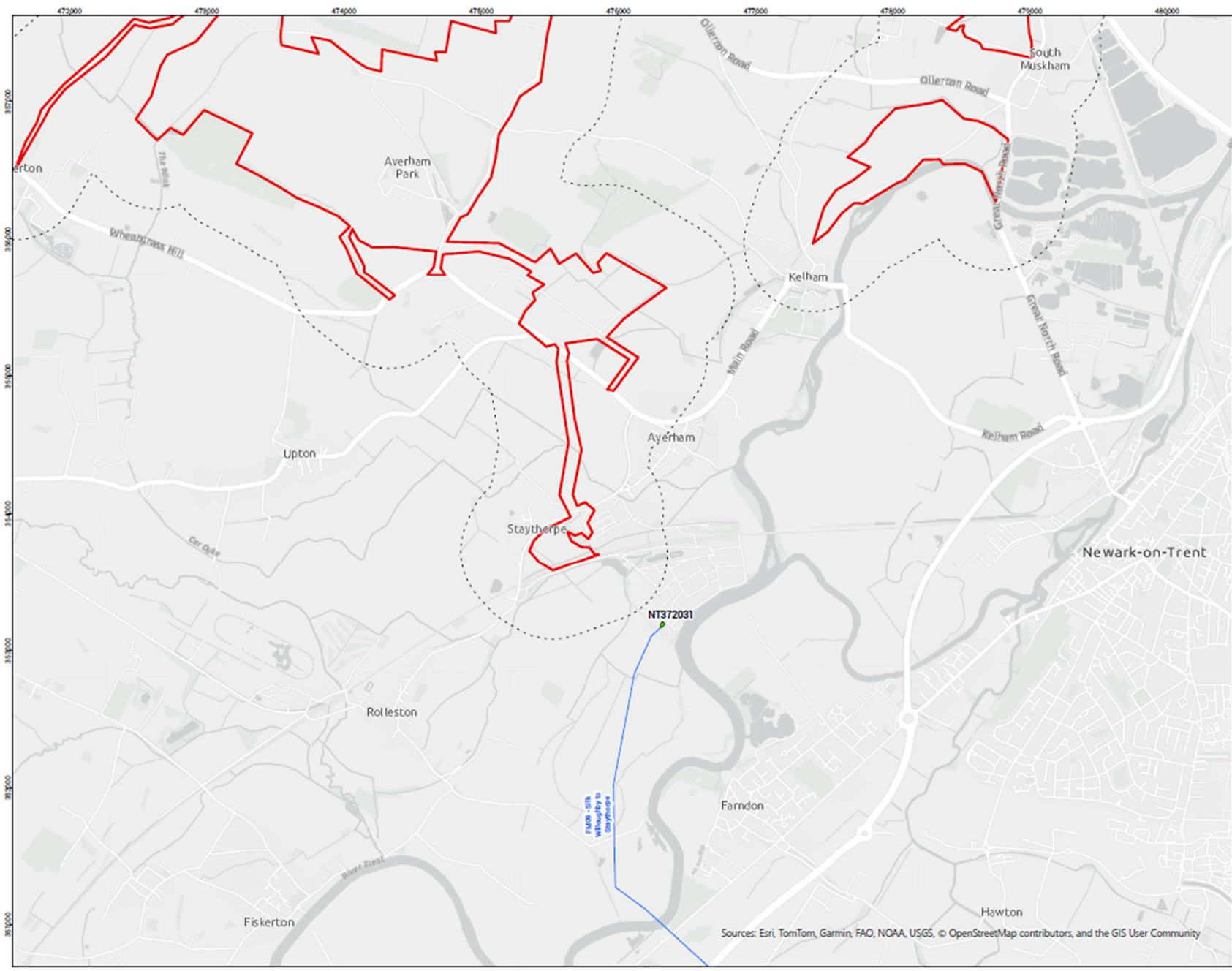
b. NGT considers that these issues can be resolved at detailed design stage to ensure that Works 6 (connection works to existing substation) and 7 (connection works to consented BESS) are constructed in such a way as to minimise the risk of electromagnetic interference to the NGT apparatus.

			<p>c. NGT does not have any record of agreeing that specific PPs for the benefit of NGT were not required. Given the need for NGT potentially to assist with the development of resolutions to any electromagnetic interference risk at design stage and, in any event, to approve the assessment and works, it does appear appropriate to NGT to include in the draft DCO a specific set of PPs for NGT's benefit</p> <p>d. NGT looks forward to working with the Applicant as expeditiously as possible to agree the final form of the specific protective provisions. NGT has a recognised standard precedent that would be satisfactory, subject to any bespoke tailoring to ensure that this particular interaction from on a pipeline 700m away is caught within the definition of 'specified work'. NGT proposes to take up this matter directly with the Applicant.</p> <p>e. This is for the Applicant to respond to.</p>
--	--	--	--

ADDLESHAW GODDARD LLP

25 MARCH 2026

Appendix 1
NGT Apparatus



- LEGEND:**
- █ NG Leasehold
 - NGT Pipeline
 - ▭ Site Location
 - Site Location 500m Buffer

REVISION: A
 CLIENT: national gas
 SCHEME: Great North Road Solar & Biodiversity Park
 TITLE: Interaction Plan

FP: 105189-001
 SCALE: 1:25,000 @ A3
 DATE: 12/03/2025



DRAWING REF:
 NGT-2025-03-A.F-P - Great North Road Solar & Biodiversity Park

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community